

REMARKS

The Office Action dated August 10, 2005 has been received and carefully considered. The applicant respectfully requests careful reconsideration of the rejections for the following reasons.

Claims 1, 5-7, 11-13, 17-20 and 67-82 remain pending in the present application. No substantive amendments to the claims have been made in the present response. Minor amendments directed only to form, and not affecting the scope of the claims (i.e., merely adding the word "and"), have been made to claims 7 and 12.

Before addressing the rejections more specifically, it is noted that the current rejections now rely on two additional references, Brett et al. and Seefeldt et al., which have previously been applied in earlier Office Actions, but which were withdrawn due to the applicant's arguments. Accordingly, it is respectfully submitted that the renewed citing of such references, after having formerly withdrawn the references, is highly unusual. Moreover, the reasons for which these references are either inapplicable, or do not teach the features of the pending claims, have already been discussed in the applicant's previous responses.

Turning first to the rejection stated on page 5 of the Office Action, claims 1, 5-7, 11-13, 17-20 and 67-82 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ebersole et al. (U.S. Patent No. 6,500,008) in view of Seefeldt et al. (U.S. Patent No. 6,448,971). This rejection is clearly improper, because Seefeldt et al. is not prior art with respect

to the claimed invention. The fact that Seefeldt et al. is not citable prior art has already been pointed out to the Examiner in the applicant's response of September 15, 2003, at which time a verified translation of the priority document was also submitted to perfect the claimed priority date of September 10, 1999. By contrast, the earliest effective date of Seefeldt et al. is January 26, 2000.

Therefore, in light of the acknowledged deficiencies of Ebersole et al. and the fact that Seefeldt et al. is not citable as prior art, it is respectfully submitted that the rejection is clearly improper and must be withdrawn.

Claims 1, 5-7, 11-13, 17-20 and 67-82 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ebersole et al. in view of Brett et al. (U.S. Patent No. 6,448,971).

The above rejection, based on the combination of Ebersole et al. and Brett et al., once again, repeats a rejection which was made earlier during prosecution of the present application, and which was withdrawn based on the applicant's arguments. More specifically, this is the same basic rejection that was raised in the Office Action of October 21, 2003, but which was withdrawn in response to arguments submitted in the applicant's response dated February 10, 2004.

Again, it is unclear why the Examiner is repeating rejections, which have previously been considered and withdrawn. In any event, it is respectfully submitted that the current rejections are in error for the same reasons as argued in the applicant's prior response of February 10, 2004.

More specifically, as was argued previously and acknowledged by the Patent Office, Ebersole et al. does not provide any suggestion for the technique of the claimed invention, wherein textures associated with respective polygons making up an object are moved, so as to become associated with different adjacent polygons in the object, and then remapped onto the adjacent polygons in a circulating manner, as presently claimed.

The secondary reference, Brett et al., also lacks any suggestion for the claimed remapping step, since likewise there is no suggestion in this reference of moving a plurality of texture images, initially associated with certain polygons, so as to become associated with other different adjacent polygons, and then remapping the textures onto the different polygons in a circulating manner, as currently claimed.

On the contrary, Brett et al. is directed to an image processing technique for use with scanned digital image data from a cinematographic film. Certain texture mapping processes used with the system are discussed in connection with FIGS. 1 through 3. However, none of these processes involves "moving" or "remapping" a texture image, so as to become associated with different adjacent polygons, in a circulating manner, as in the claimed invention.

More specifically, FIGS. 1a, 1b and 1c, which represent a problematic prior art technique according to Brett et al., show a single large texture having a fixed size and position relative to a screen frame. When the object, in this case a rectangular box 1, is moved relative to the fixed texture image, different parts

of the texture image appear on the box. Since only a single texture image is shown, which maintains a constant position relative to the frame, clearly, there can be no suggestion for *moving* and *remapping* a plurality of textures images, so as to become associated respectively with different adjacent polygons making up an object, as in the claimed invention.

FIGS. 2a, 2b and 2c represent a proposed solution to the problem illustrated in FIGS. 1a, 1b and 1c. In this case, a fixed texture is associated with a given object, again a box 1, so that the texture maintains a fixed position relative to the box as the box moves within the frame. However, in this embodiment, a fixed texture image is associated with each object, which in this case consists of a single rectangular-shaped polygon. There is also no suggestion of *moving* and *remapping* a plurality of textures, so as to become associated respectively with different adjacent polygons making up an object, as in the claimed invention.

FIGS. 3a and 3b again show a single texture image associated with a single object, which consists of a polygon viewed from different orientations. In this case, as the orientation of the box 1 in the frame is changed, as illustrated by a square changing into a trapezium shape, the texture image is warped to correspond to the displayed motion of the box. Such resizing of the texture image to fit the displayed orientation of the box, however, does not involve "moving" or "remapping" of a plurality of textures, as in the claimed invention, so as to

become associated respectively with different adjacent polygons making up an object.

Accordingly, it is respectfully submitted that neither of the cited references, Ebersole et al. or Brett et al., discloses or suggests the features recited in the pending claims.

In summary, the reinstated and repeated rejections are flawed and legally improper, essentially for the same reasons already stated in the applicant's responses to prior office actions. Since the same arguments continue to be valid with respect to the current rejections, there is no legitimate basis for reinstating these rejections, particularly in view of the fact that such rejections were previously withdrawn.

For the foregoing reasons, it is respectfully submitted that the claimed invention is novel and would not have been obvious to a person skilled in the art at the time the invention was made. Therefore, careful reconsideration of the rejections and allowance of all pending claims 1, 5-7, 11-13, 17-20 and 67-82 is respectfully requested.

No fees are currently due with this paper. Notwithstanding, should it be deemed that fees, or deficiencies in fees, are required in connection with this or any accompanying communication, such amounts may be charged to the Attorney's Deposit Account No. 07-2519.

Respectfully submitted,



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